

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	CRIMINAL NO. 13-10048-FDS
)	
KING BELIN,)	
Defendant.)	

MOTION FOR CONTINUATION OF APPOINTMENT AS COUNSEL

Undersigned counsel hereby moves this Court to allow him to remain as counsel to the Defendant in this matter after his resignation as an Assistant Federal Public Defender becomes effective on Friday, May 30, 2014. As grounds for this motion, the undersigned states as follows:

Undersigned counsel submitted his resignation to Federal Public Defender Miriam Conrad on March 17, 2014. In his resignation, undersigned counsel noted his profound gratitude to have had the opportunity to serve in and contribute to the important work of Federal Defender's Office for close to six years.

Undersigned counsel intends to enter into private practice as a sole practitioner, and to continue to practice criminal defense in federal court. Although counsel intends to apply to become a member of the CJA panel of the Eastern Division of the District of Massachusetts at the next available opportunity, he will not be a member of the panel on May 30, 2014.

The "Plan for Implementing the Criminal Justice Act of 1964," Order 13-02, Effective Nov. 14, 2013, ["Local Plan"] does allow for the appointment of private attorneys not on the CJA panel in certain, exceptional circumstances.

In exceptional circumstances, a judicial officer shall have the discretion to appoint an attorney not on the CJA Panel, or a CJA Panel member other than the duty attorney, in

order to serve the interests of justice, judicial economy, continuity in representation, or if there is some other compelling circumstance warranting such appointment.

Local Plan V. B. at 8.

The undersigned has represented the Defendant since his initial appearance on March 6, 2013. Undersigned counsel has litigated a motion to suppress, during the course of which he has met with the Defendant on multiple occasions, and will represent the Defendant at his upcoming trial, slated to begin on Monday, May 19, 2014, and has done an amount of work on the case such that it would serve the interests of continuity in representation, judicial economy and the overall interests of justice to allow him to remain as counsel to the Defendant, pursuant to the Local Plan.

The undersigned has consulted with Ms. Conrad, as well as John Salsberg, current Chair of the Criminal Justice Act Board, about the subject of continued appointment in this and other cases. Ms. Conrad and Mr. Salsberg support this motion.

WHEREFORE, counsel requests the Court order his continued appointment as counsel for Defendant after his resignation as an Assistant Federal Public Defender becomes effective on May 30, 2014.

Respectfully submitted,
KING BELIN,
By his attorney,

/s/ Ian Gold
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Date: May 9, 2014.

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date, May 9, 2014

/s/ Ian Gold